

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

IN RE:

HOUSTON REAL ESTATE PROPERTIES, §  
LLC, §  
Debtor. §

CASE NO. 22-32998  
(Chapter 7)

JOHN QUINLAN, OMAR KHAWAJA, §  
AND OSAMA ABDULLATIF, §  
Movants, §

ADVERSARY NO. 23-03141

v. §

HOUSTON REAL ESTATE PROPERTIES, §  
LLC, et al., §  
Respondents. §

**MOTION TO EXPEDITE REQUEST FOR INJUNCTIVE RELIEF**  
*(Relates to Doc. No. 1 and Doc. No. \_\_\_\_ in Adversary Proceeding)*

**THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**EXPEDITED RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EXPEDITED BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EXPEDITED CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.**

**RELIEF IS REQUESTED ON AN EXPEDITED BASIS PRIOR TO THE FORECLOSURE CURRENTLY SET FOR TUESDAY, SEPTEMBER 5, 2023.**

TO THE HONORABLE JEFFREY P. NORMAN:

Come now, John Quinlan, Omar Khawaja and Osama Abdullatif (“Movants”), herein and files this Motion to Expedite Request for Injunctive Relief (“Motion to Expedite”), and in support thereof, respectfully represents as follows:

**Background**

1. On July 12, 2023, this Court granted stay relief to John Quinlan, Omar Khawaja, and Osama Abullatif (“Movants”), permitting Movants to pursue this adversary proceeding.

2. On or about the end of July and or beginning of August 2023, Movants filed this adversary proceeding complaining of Respondents acts and omissions to jointly hide assets, evade creditors, and or shield their identities and involvement, through numerous disreputable business dealings and fraudulent transfers. Among other claims, Movants pled for injunctive relief to prevent more fraudulent transfers by Respondents. Many, if not all, of Respondents own assets, which are property of the bankruptcy estate given Movants’ claims and causes of action pled.

3. Recently, Movants learned of yet another attempt by Respondents to fraudulently transfer assets away from creditors, Movants, and the bankruptcy estate. Attached as Exhibits 1, 2, and 3, are three different Notices of Foreclosure Sale documents for three (3) different properties each owned by a different Respondent (the “Foreclosure Notices”). All of the deeds of trust being utilized to foreclose on the properties through the Foreclosure Notices were recorded after Respondents knew of the debts Movants are seeking to collect. *See* Exhibits 1-3.

4. The Foreclosure Notices are set for the coming Tuesday, September 5, 2023, date. Movants recently learned of the Foreclosure Notices and do not have time to act without an expedited setting. Accordingly, Movants expect to file a supplemental complaint and more detailed request for injunctive relief on Wednesday, August 30, 2023. However, Movants wanted

to alert the Court as soon as possible of this situation and their need for an expedited hearing and request for injunctive relief.

**Need for Expedited Consideration and Relief Requested**

5. Movants request an emergency hearing to obtain injunctive relief to preclude the September 5, 2023, foreclosures noted in the Foreclosure Notices and thus prior to the foreclosure date.

DATED: August 29, 2023

Respectfully submitted,

HOOVER SLOVACEK LLP

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*Attorneys for Movants*

**CERTIFICATE OF SERVICE**

I certify that on August 29, 2023 a copy of this Motion to Expedite Request for Injunctive Relief, was served on the parties identified below through the Court's BK/ECF filing system.

/s/ T. Michael Ballases

T. Michael Ballases